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Attorneys for Debtor and Debtor in Possession  
PLANT INSULATION COMPANY

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

In re  
PLANT INSULATION COMPANY, a  
California corporation,  
Debtor.

Case No. 09-31347-TC

Chapter 11

**JONES DAY'S COVER SHEET  
APPLICATION FOR ALLOWANCE AND  
PAYMENT OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM NOVEMBER 1,  
2009 THROUGH NOVEMBER 30, 2009**

[NO HEARING REQUIRED]

Judge: Hon. Thomas E. Carlson

Jones Day (the "Firm") submits its Cover Sheet Application (the "Application") for Allowance and Payment of Interim Compensation and Reimbursement of Expenses for the Period from November 1, 2009 through November 30, 2009 (the "Application Period"). In support of the Application, the Firm respectfully represents as follows:

1. The Firm is general bankruptcy counsel for debtor and debtor in possession Plant Insulation Company (the "Debtor") in the above-referenced Chapter 11 case. The Firm hereby applies to the Court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the Application Period.

2. The Firm billed a total of \$34,574.41 in fees and expenses during the Application Period. The total fees represent 63.50 hours expended during the period covered by this Application. These fee and expense breakdowns are as follows:

| Period             | Fees        | Expenses   | Total       |
|--------------------|-------------|------------|-------------|
| 11/1/09 – 11/30/09 | \$31,790.00 | \$2,784.41 | \$34,574.41 |

3. The Firm seeks allowance of interim compensation and reimbursement in the amount of a total of **\$28,216.41** at this time, comprising **\$25,432.00** (80% of the fees for services rendered) plus **\$2,784.41** (100% of the expenses incurred).

4. The following chart reflects (1) the post-petition compensation and expense reimbursement amounts the Firm has obtained authority to receive from the Debtor's estate pursuant to this Court's *Order Establishing Interim Fee Application and Expense Reimbursement Procedures* entered September 26, 2009 (the "Interim Fee Procedures Order"), and (2) excluding the amounts sought by this Application, the post-petition compensation and expense reimbursement amounts that are currently due and owing to the Firm from the Debtor's estate:

| Fee Statement Period | Fees Sought (100%) | Expenses Sought (100%) | Fees Authorized (80%) | Expenses Authorized (100%) | Unpaid Fees | Unpaid Expenses |
|----------------------|--------------------|------------------------|-----------------------|----------------------------|-------------|-----------------|
| 5/20/09-8/31/09      | \$423,940.00       | \$13,287.53            | \$339,152.00          | \$13,287.53                | \$0.00      | \$0.00          |
| 9/1/09 – 9/30/09     | \$33,160.00        | \$847.35               | \$26,528.00           | \$847.35                   | \$6,632.00  | \$0.00          |
| 10/1/09 – 10/31/09   | \$80,230.00        | \$421.91               | \$64,184.00           | \$421.91                   | \$16,046.00 | \$0.00          |

5. Attached hereto as **Exhibit A** is the name of each professional who performed services in connection with this case during the Application Period, his or her hourly rate and the number of hours he or she billed to each matter. Attached hereto as **Exhibit B** is the detailed billing statement for the Application Period.

6. On December 8, 2009, the Firm served a copy of this Application on the Office of the United States Trustee, the Debtor, counsel for the Official Committee of Unsecured Creditors

1 (the "Committee"), and counsel for the Futures Representative appointed by the Court in this  
2 case.

3 7. On December 8, 2009, notice of the filing of this Application was served on the  
4 Office of the United States Trustee, the Debtor, counsel to the Committee, counsel to Futures  
5 Representative and any party who has requested special notice as of the date of the Notice.

6 8. Pursuant to the Interim Fee Procedures Order, the Debtor is authorized to make the  
7 payment requested herein, or the Firm is authorized to apply any funds it holds as a retainer in the  
8 amounts requested herein, without a further hearing or order of this Court unless an objection to  
9 this Application is filed with the Court and served within ten (10) calendar days after the date of  
10 mailing of the Notice of this Application. If such an objection is filed, the Debtor is authorized to  
11 pay the 80% of the uncontested fees and 100% of the uncontested expenses.

12 9. The interim compensation and reimbursement of expenses sought in this  
13 Application is not final. Upon the conclusion of this case, the Firm will seek fees and  
14 reimbursement of the expenses incurred for the totality of the services rendered in the case. Any  
15 interim fees or reimbursement of expenses approved by this Court and received by the Firm  
16 (along with any retainer) will be credited against such final fees and expenses as may be allowed  
17 by this Court.

18 10. Based upon the foregoing, the Firm respectfully requests that the Debtor  
19 compensate and reimburse the Firm as requested herein, pursuant to and in accordance with the  
20 terms of the Interim Fee Procedures Order.

21 DATED: December 8, 2009

JONES DAY

22  
23 By: /s/ Peter J. Benvenutti

Peter J. Benvenutti

24 Attorneys for Debtor and Debtor in Possession,  
25 Plant Insulation Company  
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# **EXHIBIT A**

| <b>EXHIBIT A</b>   |     |              |                 |
|--|-----|--------------|-----------------|
| <b>ATTORNEY/PARALEGAL BILLING SUMMARY BY MONTH</b><br>(November 1, 2009 - November 30, 2009) |     |              |                 |
| <b>Meetings of and Communications with Creditors (605002)</b>                                |     |              |                 |
| <b>Attorneys</b>   |     |              |                 |
| Peter Benvenuti  | 775 | 0.70         | 542.50          |
| Michaeline Correa  | 525 | 0.20         | 105.00          |
| <b>Total</b>   |     | <b>0.90</b>  | <b>647.50</b>   |
| <b>Asset Disposition (605003)</b>  |     |              |                 |
| <b>Attorneys</b>   |     |              |                 |
| LD Blum  | 600 | 0.00         | 0.00            |
| JR Schendel  | 500 | 0.00         | 0.00            |
| <b>Total</b>   |     | <b>0.00</b>  | <b>0.00</b>     |
| <b>Case Administration (605004)</b>  |     |              |                 |
| <b>Attorneys</b>   |     |              |                 |
| Peter Benvenuti  | 775 | 0.30         | 232.50          |
| Michaeline Correa  | 525 | 0.10         | 52.50           |
| Noel Rodriguez   | 500 | 0.00         | 0.00            |
| R Shah   | 325 | 0.00         | 0.00            |
| <b>Paralegals</b>  |     |              |                 |
| Nubuyo Breen   | 275 | 5.00         | 1,375.00        |
| LP Burns   | 275 | 0.00         | 0.00            |
| Brett Stone  | 275 | 0.00         | 0.00            |
| B Mossadegh  | 150 | 4.00         | 600.00          |
| <b>Total</b>   |     | <b>9.40</b>  | <b>2,260.00</b> |
| <b>Relief from Stay/Adequate Protection Proceedings (605005)</b>                             |     |              |                 |
| <b>Attorneys</b>   |     |              |                 |
| Peter Benvenuti  | 775 | 0.10         | 77.50           |
| Michaeline Correa  | 525 | 1.00         | 525.00          |
| <b>Total</b>   |     | <b>1.10</b>  | <b>602.50</b>   |
| <b>Fee/Employment Applications (Jones Day) (605006)</b>                                      |     |              |                 |
| <b>Attorneys</b>   |     |              |                 |
| Peter Benvenuti  | 775 | 3.50         | 2,712.50        |
| Zana Bugaighis   | 325 | 0.00         | 0.00            |
| Michaeline Correa  | 525 | 5.40         | 2,835.00        |
| R Shah   | 325 | 0.00         | 0.00            |
| <b>Paralegals</b>  |     |              |                 |
| Brett Stone  | 275 | 1.50         | 412.50          |
| <b>Total</b>   |     | <b>10.40</b> | <b>5,960.00</b> |
| <b>Fee/Employment Applications (Other) (605007)</b>  |     |              |                 |
| <b>Attorneys</b>   |     |              |                 |
| Peter Benvenuti  | 775 | 1.30         | 1,007.50        |

|  |     |              |                 |
|--|-----|--------------|-----------------|
| Zana Bugaighis                                       | 325 | 0.00         | 0.00            |
| Michaeline Correa                                    | 525 | 1.10         | 577.50          |
| <b>Paralegals</b>                                    |     |              |                 |
| Brett Stone  | 275 | 0.00         | 0.00            |
| <b>Total</b>   |     | <b>2.40</b>  | <b>1,585.00</b> |
| <b>Tax Issues (605008)</b>                           |     |              |                 |
| <b>Attorneys</b>                                     |     |              |                 |
| Peter Benvenuti                                      | 775 | 0.10         | 77.50           |
| Michaeline Correa                                    | 525 | 0.10         | 52.50           |
| Teresa Maloney                                       | 750 | 0.00         | 0.00            |
| <b>Total</b>   |     | <b>0.20</b>  | <b>130.00</b>   |
| <b>Asset Analysis and Recovery (605009)</b>          |     |              |                 |
| <b>Attorneys</b>                                     |     |              |                 |
| Peter Benvenuti                                      | 775 | 0.00         | 0.00            |
| LD Blum  | 600 | 0.00         | 0.00            |
| Michaeline Correa                                    | 525 | 0.00         | 0.00            |
| JR Schendel  | 500 | 0.00         | 0.00            |
| <b>Total</b>   |     | <b>0.00</b>  | <b>0.00</b>     |
| <b>Business Operations (605011)</b>                  |     |              |                 |
| <b>Attorneys</b>                                     |     |              |                 |
| Peter Benvenuti                                      | 775 | 0.60         | 465.00          |
| LD Blum  | 600 | 2.60         | 1,560.00        |
| Michaeline Correa                                    | 525 | 1.40         | 735.00          |
| JR Schendel  | 500 | 0.00         | 0.00            |
| R Shah   | 325 | 17.10        | 5,557.50        |
| <b>Total</b>   |     | <b>21.70</b> | <b>8,317.50</b> |
| <b>Appeals (605012)</b>                              |     |              |                 |
| <b>Attorneys</b>                                     |     |              |                 |
| Peter Benvenuti                                      | 775 | 0.00         | 0.00            |
| Michaeline Correa                                    | 525 | 0.00         | 0.00            |
| <b>Total</b>   |     | <b>0.00</b>  | <b>0.00</b>     |
| <b>Operating Reports (605020)</b>                    |     |              |                 |
| <b>Attorneys</b>                                     |     |              |                 |
| Peter Benvenuti                                      | 775 | 0.30         | 232.50          |
| Michaeline Correa                                    | 525 | 0.40         | 210.00          |
| <b>Total</b>   |     | <b>0.70</b>  | <b>442.50</b>   |
| <b>Plan and Disclosure Statement (605014)</b>        |     |              |                 |
| <b>Attorneys</b>                                     |     |              |                 |
| Peter Benvenuti                                      | 775 | 0.00         | 0.00            |
| Michaeline Correa                                    | 525 | 0.00         | 0.00            |
| <b>Total</b>   |     | <b>0.00</b>  | <b>0.00</b>     |
| <b>Claims Administration and Objections (605016)</b> |     |              |                 |
| <b>Attorneys</b>                                     |     |              |                 |

|  |     |              |                  |
|--|-----|--------------|------------------|
| Peter Benvenuti  | 775 | 10.70        | 8,292.50         |
| Michaeline Correa  | 525 | 4.00         | 2,100.00         |
| D E Roberts  | 325 | 0.00         | 0.00             |
| <b>Paralegals</b>  |     |              |                  |
| LP Burns   | 275 | 0.00         | 0.00             |
| B Mossadegh  | 150 | 0.00         | 0.00             |
| Brett Stone  | 275 | 0.00         | 0.00             |
| <b>Total</b>   |     | <b>14.70</b> | <b>10,392.50</b> |
| <b>Assumption/Rejection of Leases and Contracts (605017)</b> |     |              |                  |
| <b>Attorneys</b>   |     |              |                  |
| Peter Benvenuti  | 775 | 0.20         | 155.00           |
| Michaeline Correa  | 525 | 0.30         | 157.50           |
| <b>Total</b>   |     | <b>0.50</b>  | <b>312.50</b>    |
| <b>Insurance Issues/Litigation (605018)</b>                  |     |              |                  |
| <b>Attorneys</b>   |     |              |                  |
| Peter Benvenuti  | 775 | 1.20         | 930.00           |
| Martin Myers   | 700 | 0.30         | 210.00           |
| Michaeline Correa  | 525 | 0.00         | 0.00             |
| <b>Paralegals</b>  |     |              |                  |
| LP Burns   | 275 | 0.00         | 0.00             |
| <b>Total</b>   |     | <b>1.50</b>  | <b>1,140.00</b>  |
|  |     |              |                  |
| <b>GRAND TOTAL</b>   |     | <b>63.50</b> | <b>31,790.00</b> |
|  |     |              |                  |